

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA.

CASE NO: 00-6309-CR-SEITZ

UNITED STATES OF AMERICA,

CH

Plaintiff,

-VS-

JULIUS BRUCE CHIUSANO.

Defendant.

MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE

COMES NOW, the Defendant, JULIUS BRUCE CHIUSANO, by and through undersigned counsel and files this his Motion to Modify Conditions of Pretrial Release, and respectfully requests this Honorable Court enter an Order modifying the conditions of pretrial release, and as grounds, would show unto the Court the following;

1. That the Defendant, JULIUS BRUCE CHIUSANO, is presently released on a one hundred thousand dollar corporate surety bond with supervised release.
 2. That the Defendant is also released on bond on a one hundred thousand dollar corporate surety bond in Case No. 00-6273-Cr-Huck.
 3. That the Defendant has been on supervised release with Pretrial Services since October 5, 2000.
 4. That as one of the conditions of the Pretrial Services, the Defendant has been subject to random urinalysis.
 5. That all urinalysis testing has been of a negative result for the use of any illegal drugs and as such the Defendant respectfully requests this Honorable Court to modify/delete the requirement of the random urinalysis.
 6. That this motion has been discussed with Raul Sagaro, of Pretrial Services regarding this modification and he has no objection to the court entering an order deleting the random urinalysis condition from Defendant's pretrial services obligation.

WHEREFORE, by reason of the foregoing, the Defendant, JULIUS BRUCE

CHIUSANO, respectfully requests this Honorable Court enter an Order deleting the condition of random urinalysis from the Defendant's pretrial services obligation.

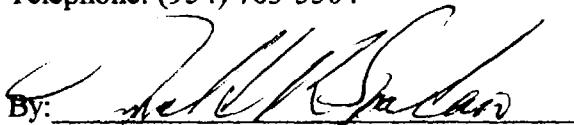
10-G CERTIFICATE

That undersigned counsel, pursuant to Local Rule 10(G)(1) certifies that he has contacted the opposing counsel, Assistant United States Attorney, Jeffrey Sloman on behalf of Brian McCormick, of the Southern District of Florida in an effort of good faith to resolve by agreement the subject matter and he states that he has no objection to the granting of this motion.

I HEREBY CERTIFY that a copy of the foregoing has been furnished to Jeffrey Sloman on behalf of Brian McCormick, Assistant United States Attorney, United States Attorney's Office, 299 East Broward Boulevard, Fort Lauderdale, FL 33301, by Facsimile (954-356-7230) and U.S. Mail Delivery; and Raul Sagaro, Pretrial Services, 330 Biscayne Blvd., Suite 500, Miami, FL 33132, (by Facsimile (305-530-7123), and the original hereof filed with the Clerk of the Court, by Hand Delivery, this 9th FEBRUARY, 2001.

Respectfully submitted,

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By: 
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